

**LaMonica Herbst & Maniscalco, LLP**

*Proposed Counsel to the Debtor*  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

RISE DEVELOPMENT PARTNERS, LLC,

Case No. 23-44119 (ESS)

Debtor.

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**DEBTOR’S REPORT PURSUANT TO 11 U.S.C. § 1188(c)**

Rise Development Partners, LLC, the debtor and debtor in possession (the “Debtor”), through its proposed attorneys, LaMonica Herbst & Maniscalco, LLP, submits the following report pursuant to 11 U.S.C. § 1188(c) and respectfully represents:

1. Pursuant to 11 U.S.C. § 1188(c), the Debtor is required to file with the Court a report that details the efforts the debtor has undertaken and will undertake to attain a consensual plan of reorganization.

2. The Debtor filed its chapter 11 case on November 10, 2023.

3. The Debtor anticipates that it will timely file its plan of reorganization (the “Plan”) on or before February 8, 2024, in accordance with 11 U.S.C. § 1189.

4. A bar date was set by the Court for the filing of proofs of claim not later than January 19, 2024 (with government units to file claims by May 8, 2024).

5. Since the Filing Date, the Debtor and its counsel have been addressing its “first day” motions seeking customary relief and stabilizing the Debtor’s operations.

6. The Debtor, through counsel, has conferred with the Subchapter V trustee concerning the case and initial course of action herein.

7. The Debtor and its counsel have held preliminary discussions concerning a possible Plan of reorganization, which may include an orderly liquidation.

8. The Debtor, through counsel, intends to confer with multiple creditors in an attempt to formulate and achieve a confirmed consensual chapter 11 Plan. Further, the Debtor, through counsel, anticipates conferring with the subchapter V trustee as warranted to the extent such efforts may facilitate such a consensual Plan.

9. This report is submitted without prejudice to the Debtor, and with a full reservation of rights.

Dated: December 7, 2023  
Wantagh, New York

**LAMONICA HERBST & MANISCALCO, LLP**  
Proposed Counsel to the Debtor

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